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September 14, 2009

Mr. Russ K. Saito, State Comptroller
State of Hawaii Department of Accounting and General Services
P. O. Box 119
Honolulu, Hawaii 96810

Dear Mr. Saito:

Subject: Section 4(f) Coordination for *De Minimis* Impact Finding
Aloha Stadium
Honolulu High-Capacity Transit Corridor Project

Section 4(f) of the U.S. Department of Transportation Act of 1966 (23 U.S.C. 138 and 49 U.S.C. 303) requires that the proposed use of land from a publicly-owned parkland, recreation area, wildlife and/or waterfowl refuge, or any significant historic or archaeological site, as part of a federally funded or approved transportation project, is permissible only if there is no feasible and prudent alternative to the use. Section 6009 (a) of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) allows the Federal Transit Administration (FTA) to determine that certain transportation uses of Section 4(f) land will have no adverse effect on the protected resource. With respect to publicly-owned parklands and recreational areas, a finding of *de minimis* impact may occur if the transportation use of the Section 4(f) resource, together with any impact avoidance, minimization, and mitigation or enhancement measures incorporated into the project, does not adversely affect the activities, features, and attributes that qualify the resource for protection under Section 4(f). If this is the case, the *de minimis* finding requires written concurrence from the official(s) with jurisdiction over the resources. In addition, public notice and opportunity for public review and comment on the finding is required.

The U. S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) are preparing the Final Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project preferred alternative - the Airport Alignment (the Project) which addresses mobility and accessibility issues in the corridor between East Kapolei and Downtown Honolulu. The selection of this alternative following the public comment period of the Draft EIS took into consideration its ability to achieve Project goals and

minimize adverse impacts to social, economic and environmental conditions. In addition, coordination with DAGS and the Aloha Stadium manager has been on-going to design the Project to minimize impacts to Aloha Stadium property and be consistent with the recreational facility plans.

The direct impact to the Aloha Stadium involves construction of an elevated guideway through a portion of the Aloha Stadium parking lot along the `Ewa edge of the property from a rail transit station and bus transit center, and a paved and striped parking lot. The elevated guideway will be about 28-30 feet wide, supported by columns that are about 6 to 8 feet in diameter, placed about 120 feet apart. The base of each of the columns will impact approximately 100 square feet. The guideway will be used by electrically powered trains carrying people between stations and will be about 35-40 feet above the ground through this area. The total amount of area that will be used by the Project will be approximately two acres. This amount includes land under the guideway that may be used for parking. The overall impact area, including the new park-and-ride function, will be approximately 6.2 acres. A figure illustrating the Project and its features is attached.

The elevated guideway will pass over a small portion of the main parking lot, next to Kamehameha Highway. Approximately four columns will be placed in the main parking lot to support the guideway, requiring removal of approximately three parking spaces. The guideway will cross over Salt Lake Boulevard at Kamehameha Highway, continuing above the existing gravel overflow parking lot, supported by six columns. In the overflow lot, the Project will construct a rail station and bus transit center to serve the stadium, and will pave and stripe the gravel lot creating about 600 parking spaces that can also be used by stadium patrons during stadium events. An additional six guideway support columns will be located on Aloha Stadium property south of the overflow parking lot next to Kamehameha Highway. The guideway in this area will be wider than 30 feet to accommodate a third track to accommodate additional trains during stadium events.

The guideway design has been developed in close consultation with your agency to minimize impact to the stadium parking area. This alignment is far less intrusive than the former Salt Lake alternative, and we remain committed to minimizing additional impact to parking and event spaces. The Project will provide transportation benefits to Aloha Stadium that will enhance its ability to provide recreational opportunities to users, offering choice, greater capacity and improved service. The transportation use of the site will not change with the Project. It will provide an additional form of access to Aloha Stadium via the new fixed guideway. The stadium will be one of 21 station stops on the 20-mile system that will be used by more than 100,000 riders on an average weekday. The station can be used up to 20 hours a day, from 4:00 a.m. to 12:00 midnight. Trains will arrive every few minutes, and extra trains can be coordinated to accommodate peak demand during Aloha Stadium events. Use of the park-and-ride area will also be dedicated for use by the stadium during stadium facility functions and events. Normally, the system will provide capacity for more than 6,000 riders per hour in each direction, but this could be greatly increased to meet demand during Stadium events or other peak periods. In addition to providing train service, the Project will convert the existing gravel overflow area to a paved, striped parking lot and bus transit center. This will enhance the existing auto access without substantially reducing capacity. Buses, shuttles and taxis will be able to pull off-street to serve the station and Aloha Stadium, providing a multi-modal transit center that will provide access from all directions.

We are also mindful of and committed to mitigating disturbance during construction and operation of the transit system that may adversely affect stadium operations and the outlying community, including loss of stadium parking and access, additional noise, and safety and security issues due to the mixing of pedestrian and vehicular traffic. Serious considerations to address these impacts include construction of a new multi-level parking structure for shared use between the park-and-ride and the stadium during stadium events and functions, and realignment of Salt Lake Boulevard (SLB) as it runs between the Stadium's Kamehameha lot and bus lot. Work would include removal of traffic lights at the corners of Essex Road/Main Salt Lake Gate 1 (MSLG1) and SLB/Kamehameha Highway, and the establishment of two-way traffic on Essex Road. Essex Road and the intersection at Essex Road/Kamehameha Highway would have to be modified to accommodate heavier traffic flow in this area. New ingress/egress options for MSLG 1 and Kamehameha lot would be considered as well.

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We request your concurrence that the Project will not adversely affect the activities, features or attributes of Aloha Stadium. Upon your written agreement, the DTS intends to propose a *de minimis* impact finding to the FTA for the use of the park property in the Final EIS. The *de minimis* finding was presented in the Draft EIS for public comment on the proposed impact. If you agree with this statement, please indicate your concurrence on the signature line below.

Thank you, in advance, for your assistance regarding this request. If you have any questions regarding this matter, please contact Ms. Faith Miyamoto of the Rapid Transit Division at 768-8350.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Concur:

_____ _____
Russ K. Saito, State Comptroller Date
Department of Accounting
And General Services

_____ _____
Laura H. Thielen, Chair Date
Board of Land and Natural Resources